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APR 25 2001

Magalie Roman Salas
Federal Communications Commission
Office of the Secretary
445 Twelfth Street, SW
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: E-911 TTY Compatibility Implementation Status Report
of Triton PCS, Inc., CC Docket No. 94-102

Dear Ms. Salas:

Pursuant to the Commission's Fourth Report and Order in CC Docket 94-102 ("Fourth R&O"), this letter provides a status report on the efforts by Triton PCS, Inc. and its licensee subsidiary ("Triton") to implement E-911 TTY compatibility.

In the Fourth R&O, the Commission requested that carriers provide quarterly reports on the 15th of the month following the end of the relevant quarter, detailing certain development, testing, and deployment activities. This letter is Triton's official TTY report for 1st Quarter 2001. This letter is being filed several days after the Commission's established deadline for TTY report filings. This short delay in reporting is due to changes in responsibilities within Triton's mandate and compliance staff. To the extent the Commission staff deems it necessary or appropriate, Triton respectfully requests a waiver of the initial filing deadline.

Through a subsidiary, Triton holds PCS licenses for markets in portions of North Carolina, South Carolina, Virginia, Kentucky, West Virginia, Georgia, and Tennessee. Across these markets it utilizes LM Ericsson Telephone Co. ("Ericsson") TDMA infrastructure equipment. As a result, Triton is directly dependent upon Ericsson for the implementation of TTY solutions. From Ericsson, Triton understands that a patch to Generic Version 7 switch software will enable TTY compatibility for E-911 applications. Triton has received no formal commitment regarding when the patch will be available to carriers. Once Ericsson's TTY solutions are commercially available, Triton will implement them into its network.

With respect to handset availability, Triton does not manufacture handsets, and accordingly, must rely upon the efforts of nationally known handset manufacturers that support TDMA

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transmissions. Until such time as Ericsson's switching software upgrades are available, Triton does not have the ability to test handsets for network TTY compatibility.

In establishing its quarterly reporting requirement, the Commission specifically requested that reporting carriers provide information on the following "milestones" and issues:

Development Activities

1. network infrastructure software development;

As outlined above, Ericsson is Triton's infrastructure vendor across Triton's entire network. Ericsson has reported to Triton that it is performing the necessary software development to incorporate TTY compatibility into Triton's network.

2. handset development and testing plans;

Handset development and testing is the responsibility of Triton's handset vendors/manufacturers. As indicated above, Triton does not manufacture any handsets itself and must rely on the handset vendor's efforts.

3. beta testing and lab testing;

This testing will be completed by the handset vendors rather than carriers such as Triton.

4. release and general availability to carriers of network infrastructure software;

Triton will make use of Ericsson's software according to Ericsson's schedule of release and general availability to carriers of the patch to Generic Version 7 switch software.

5. availability to carriers of full acceptance test units;

After compatible handsets are made available by Triton's handset manufacturers, (and after the necessary switch software upgrades are implemented) Triton will obtain test units for acceptance testing.

6. efforts toward achieving digital wireless solution compatibility with enhanced TTY devices;

These efforts are directly dependent on the efforts of Triton's infrastructure vendor, Ericsson and upon its handset vendors. After the necessary switch software upgrades are implemented and compatible handsets are available, Triton will take all steps within its control to comply with utilization of enhanced TTY devices that are compatible with the Ericsson TDMA platform that makes up its network.

Testing and Deployment Activities

7. carrier coordination of testing with PSAP;

Triton intends to utilize its existing relationships with PSAPs to facilitate testing of TTY after the necessary switch software upgrades and compatible handsets are available.

8. carrier testing activities, including field testing, consumer end-to-end testing, and other necessary tests;

Until such a time as the necessary switch software upgrades are implemented and compatible handsets are available, Triton can only develop a thorough test plan to ensure full compliance with TTY compatibility requirements. Once software upgrades have been completed and handsets are made available, Triton will conduct tests to ensure achievement of TTY compatibility requirements.

9. retail availability of necessary consumer equipment; and

When TTY compatible consumer equipment becomes available, Triton will utilize its established chain of retail outlets, its Internet website and all other marketing sources to make TTY compatible equipment available to interested subscribers.

10. geographic scope of network infrastructure deployment.

Triton intends to deploy TTY compatibility in its entire network once the necessary switch software is available from Ericsson, TTY enabled handsets are available from handset vendors, and adequate testing has taken place to ensure that the requirements of TTY compatibility are fully met. Triton cannot provide a date certain as to when each of these milestones will be completed, however, it will continue to monitor the events that must occur prior to Triton's ability to test TTY performance on its network.

Should any questions arise or if there is need for further information concerning Triton's status report, please contact the undersigned at (202)-776-2824.

Respectfully submitted,

A handwritten signature in cursive script, reading "Laura H. Phillips".

Laura H. Phillips
Counsel for Triton PCS, Inc.

cc: Kris Monteith – Chief, Policy Division, Wireless Telecommunications Bureau
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